

1 Mark E. Merin (State Bar No. 043849)
2 Paul H. Masuhara (State Bar No. 289805)
3 LAW OFFICE OF MARK E. MERIN
4 1010 F Street, Suite 300
5 Sacramento, California 95814
6 Telephone: (916) 443-6911
7 Facsimile: (916) 447-8336
8 E-Mail: mark@markmerin.com
9 paul@markmerin.com

10 Attorneys for Plaintiffs
11 ESTATE OF SALVADOR ROMERO
12 and EMILIA ABEYTA

13 Danielle K. Lewis (State Bar No. 218274)
14 Hawkins Parnell & Young, LLP
15 33 New Montgomery, Suite 800
16 San Francisco, CA 94105
17 Telephone: 415.979.2073
18 Email: dlewis@hpylaw.com

19 Attorneys for Defendants
20 COUNTY OF SOLANO, SOLANO COUNTY
21 SHERIFF'S OFFICE, THOMAS FERRARA,
22 HUNT, and KIMBROUGH

23 UNITED STATES DISTRICT COURT

24 EASTERN DISTRICT OF CALIFORNIA

25 SACRAMENTO DIVISION

26 ESTATE OF SALVADOR ROMERO and
27 EMILIA ABEYTA,

28 Plaintiffs,

vs.

1 COUNTY OF SOLANO, SOLANO COUNTY
2 SHERIFF'S OFFICE, THOMAS FERRARA,
3 HUNT, KIMBROUGH, CALIFORNIA
4 FORENSIC MEDICAL GROUP dba
5 WELLPATH, INC., and DOE 1 to 20,

6 Defendants.

7 Paul A. Cardinale (SBN 215812)
8 Gregory T. Fayard (SBN 212930)
9 MEDICAL DEFENSE LAW GROUP
10 3800 Watt Avenue, Suite 245
11 Sacramento, CA 95821
12 Telephone: (916) 244-9111

13 Attorneys for Defendant
14 CALIFORNIA FORENSIC MEDICAL
15 GROUP, INC. (erroneously sued as California
16 Forensic Medical Group dba Wellpath, Inc.)

17 Case No. 2:23-cv-00523-JAM-AC

18 **JOINT STIPULATION RE: INITIAL
19 DISCOVERY, FIRST AMENDED
20 COMPLAINT, AND RESPONSIVE
21 PLEADINGS; ORDER**

STIPULATION

The Parties—Plaintiffs Estate of Salvador Romero (“Estate”) and Emilia Abeyta (collectively, “Plaintiffs”); Defendant California Forensic Medical Group, Inc. (“CFMG”); and Defendants County of Solano, Solano County Sheriff’s Office, Thomas Ferrara, Hunt, and Kimbrough (collectively, “County Defendants”—all through their undersigned counsel of record, and subject to the approval of the Court, have diligently and in good faith met and conferred and stipulate as follows:

WHEREAS, Plaintiffs intend to amend their complaint upon receipt and review of initial discovery;

WHEREAS, under Federal Rule of Civil Procedure 26(1)(A), the Parties must produce initial disclosures;

WHEREAS, the Estate propounded requests for production, set one, on County Defendants and CFMG, with current due dates of July 3, 2023;

WHEREFORE, the Parties have met-and-conferred in good faith and reached an agreement as to the sequence of production of initial discovery, the filing of the First Amendment Complaint, and the filing of responsive pleadings, in manner that is efficient and accommodates the Parties' availability;

Now, THEREFORE, the Parties STIPULATE that:

1. The Parties shall produce initial disclosures under Federal Rule of Civil Procedure 26(1)(A), including copies of the documents identified therein, on or before August 11, 2023;

2. County Defendants and CFMG shall produce responses to the Estate's requests for production, set one, on or before August 11, 2023;

3. Plaintiff shall file a First Amended Complaint, pursuant to Federal Rule of Civil Procedure 15(a)(2), on or before September 8, 2023;

4. County Defendants and CFMG shall file their respective responsive pleadings within 30 days of the filing and service of the First Amended Complaint; and

5. The Parties shall file an Updated Joint Status Report within 30 days of the filing of the First Amended Complaint, pursuant to the Court's Minute Order, ECF No. 9.

IT IS SO STIPULATED.

1 Dated: June 9, 2023

Respectfully Submitted,
LAW OFFICE OF MARK E. MERIN

/s/ Mark E. Merin

4 By: _____

5 Mark E. Merin
Paul H. Masuhara

6 Attorneys for Plaintiffs
7 ESTATE OF SALVADOR ROMERO
and EMILIA ABEYTA

8 Dated: June 9, 2023

Respectfully Submitted,
9 Hawkins Parnell & Young, LLP

10 */s/ Danielle K. Lewis*
(as authorized on June 9, 2023)

11 By: _____

12 Danielle K. Lewis

13 Attorneys for Defendants
14 COUNTY OF SOLANO, SOLANO COUNTY
SHERIFF'S OFFICE, THOMAS FERRARA,
HUNT, and KIMBROUGH

15 Dated: June 9, 2023

Respectfully Submitted,
16 MEDICAL DEFENSE LAW GROUP

17 */s/ Gregory T. Fayard*
(as authorized on June 9, 2023)

18 By: _____

19 Gregory T. Fayard

20 Attorneys for Defendant
21 CALIFORNIA FORENSIC MEDICAL
GROUP, INC. (erroneously sued as California
22 Forensic Medical Group dba Wellpath, Inc.)

ORDER

GOOD CAUSE APPEARING, the Parties' Stipulation is **GRANTED**.

1. The Parties shall produce initial disclosures under Federal Rule of Civil Procedure 26(1)(A), including copies of the documents identified therein, on or before **August 11, 2023**;

2. County Defendants and CFMG shall produce responses to the Estate's requests for production, set one, on or before **August 11, 2023**;

3. Plaintiff shall file a First Amended Complaint, pursuant to Federal Rule of Civil Procedure 15(a)(2), on or before **September 8, 2023**;

4. County Defendants and CFMG shall file their respective responsive pleadings within **30 days** of the filing and service of the First Amended Complaint; and

5. The Parties shall file an Updated Joint Status Report within **30 days** of the filing of the First Amended Complaint, pursuant to the Court's Minute Order, ECF No. 9.

IT IS SO ORDERED.

Dated: June 12, 2023

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE